

4 Environmental Analysis

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4.1 SUMMARY

California State Parks is the lead agency responsible for preparation of the proposed ABDSP General Plan in compliance with the California Environmental Quality Act (CEQA) as required by the PRC §5002.2 and 21000 et. Seq. This Environmental Analysis Section and other sections of this document constitute the first tier Environmental Impact Report (EIR) as defined in §15166 of the CEQA Guidelines. It should be recognized that the level of detail addressed by this EIR is comparable to the level of detail provided in the land-use proposals of the General Plan. As subsequent management plans and site-specific projects are proposed, they will be subject to further environmental review.

The proposed ABDSP General Plan includes modifications to land-use designations, the incorporation of goals and guidelines for protection of natural and cultural resources, and the development of appropriate recreational, interpretive, and operational facilities. The General Plan proposes to:

- ❑ Extend existing State Wilderness by approximately 9%. This results in approximately 55,797 acres classified as State Wilderness sub-unit in addition to the State Park designation, thereby providing further protection to resources and wilderness values.
- ❑ Classify approximately 443 acres as a Cultural Preserve sub-unit in the San Felipe Valley area, in which development and uses are restricted to protect the integrity of significant sensitive resources.
- ❑ Establish management goals and guidelines and management zones for resource management, facility operations, and accessible interpretive and recreational programs for the public within ABDSP.

In addition, the General Plan proposes that seven focused management plans (Cultural Resources, Natural Resources, Backcountry Camping, Roads, Trails, Interpretive, and Facility) be prepared subsequent to adoption of the General Plan.

Development, maintenance, facility use, and recreational activities allowed by the General Plan have the potential to cause short- and long-term impacts to the environment. These impacts could include soil disturbance, erosion, lowered water quality and quantity, degradation of cultural resources, degradation of aesthetic resources, and degradation of sensitive plant and animal populations or their habitats. As a program level (first-tier) EIR (see CEQA Guidelines §15166, 15168), the General Plan identifies broad, park-wide environmental impacts and mitigation measures. Future management plans, activities, and projects will be subject to additional environmental review in order to identify specific impacts and appropriate mitigation and monitoring plans. All potentially new adverse impacts will be avoided, minimized, or mitigated to a level below significance.

Throughout the General Plan process, four Plan Alternatives were considered (see Figures 6.6–6.9) including Alternative 3 the Environmentally Superior Alternative. The Environmentally Superior Alternative is similar to the Preferred Plan except for the following:

- ❑ The amount of acreage of Natural or Cultural Preserves would be **substantially** more. Approximately **47,650** acres would be classified as a Cultural and/or Natural Preserve sub-unit to the existing State Park classification, thereby potentially significantly limiting recreation activities, such as highway-legal vehicle use, equestrian use, open camping, off-trail hiking, and overnight camping.
- ❑ Backcountry designations would be approximately 3% less.

The Preferred Plan allows for existing recreation activities to continue while providing protection to sensitive Park resources. The Environmentally Superior Alternative provides greater protection to cultural and natural resources, but has the potential to significantly **reduce** existing recreation activities within ABDSP and **cause the demand for recreational access to shift to areas outside of the park, potentially resulting in significant offsite impacts to sensitive resources.**

4.2 PROJECT DESCRIPTION

To meet requirements set forth in §5002.2 of the PRC and §4332 of title 14 of the California Administration Code, California State Parks has prepared this General Plan for ABDSP. The plan delineates a number of management zones and establishes a set of goals and guidelines (see §3), which will guide Park management and specific project implementation. These goals and guidelines address recreational, operational, interpretive, and resource management opportunities and constraints consistent with the classifications of State Park, State Wilderness, and Cultural Preserve, as set forth in §5019.53 – §5019.74, of the Public Resources Code and consistent with Department Resource Management Directives. The General Plan does not actually design or locate facilities, but instead establishes regions or “zones” that delineate levels of acceptable facility development, and also provides goals and guidelines for the appropriate types, locations, and designs of facilities that may be proposed in the future. The Park mission and vision give insight into the Park purpose and future planning efforts. The General Plan also establishes the primary interpretive themes for programs and activities.

4.3 ENVIRONMENTAL SETTING

Please refer to the description of the environmental setting in earlier sections *Existing Conditions and Issues* (§2), *Biotic Resources* (§2.2.2), *Cultural Resources* (§2.2.3), *Aesthetic* (§2.2.4), *Interpretive and Educational* (§2.2.5), *Recreational Resources* (§2.2.7), and *Planning Influences* (§2.3).

Access to the Park is available by a number of paved highways. Interstate 8 cuts along the southern boundary of ABDSP between Jacumba and Mountain Springs. State Highway 78 (see Figure 6.1 “Facilities”) bisects the Park in an east/west direction between Scissors Crossing and Ocotillo Wells and is a primary access corridor into the Park. Four county highways also provide access to the Park and to the town of Borrego Springs: County Highway S1, known as Sunrise Highway cuts through the high elevations between Mount

Laguna and Cuyamaca Lake; County Highway S2 slices a northwest to southeast line through the southern half of the Park between Scissors Crossing and the Imperial County line near Mortero Wash; and County Highway S22 enters the Park at 4,000 feet elevation just east of the hamlet of Ranchita and descends into Borrego Valley, then proceeds eastward to Salton City, exiting the Park at the Imperial County Line. There are also four airstrips within the desert region of San Diego County: Borrego Valley Airport, Borrego Air Ranch, Earthquake Valley airstrip, and Agua Caliente airstrip.

4.4 PLAN ALTERNATIVES

Based on accumulated information from Park staff, resource inventories and studies, other agencies, Park managers, and the general public (written comments, public meetings, and Focused Use Group meetings), four plan alternatives were considered during the development of the proposed General Plan. The Preferred Plan is discussed in §3. The primary distinctions between the alternatives reflect State Park, State Wilderness, and Natural/Cultural Preserve designations and the allowable activities and facilities in each of these land use areas. These alternatives are shown in Figures 6.6–6.9, and are compared in the “Alternatives Matrix Proposed Uses and Environmental Impacts” in Table 5.7.

The Preferred Plan emerged through incorporation of public comments at the planning meetings, resource data, and operational data obtained during the general plan process. The Preferred Plan merges elements from the three alternative designs presented during the planning phase. Characteristics of each of the alternatives were used to formulate a plan that balanced protection of sensitive natural and cultural resources with providing opportunities for high quality outdoor recreation. The planning team incorporated all the information obtained during the planning process to develop the Preferred Plan as the best alternative meeting the Park Vision and CSP *Mission*.

4.4.1 PREFERRED ALTERNATIVE

The preferred Alternative (Figure 6.6) is discussed in full in §3. The following is a brief synopsis of the six proposed zones:

4.4.1.2 State Wilderness

A continuous effort to acquire more land by the Anza-Borrego Foundation has provided an opportunity to include adjacent areas into the State Wilderness classification, as in the case of Coyote Canyon. An additional 9% of the Park will become State Wilderness under the Preferred Plan. New State Wilderness areas are primarily based on natural landscape features, solitude, aesthetics, and protection of the Park’s natural and cultural resources.

4.4.1.3 *Cultural Preserve*

The proposed Cultural Preserve near Scissors Crossing will limit recreation opportunities such as equestrian, mountain biking, and highway-legal vehicle use, but will permit hiking on designated trails and offer new educational/interpretive opportunities. Although the Cultural Preserve makes up less than 1% of the Park, it will protect the environmental integrity of some of ABDSP's most valuable and sensitive resources. Subsequent to the adoption of the General Plan, a Cultural Resources Management Plan, a Roads Management Plan, and a Backcountry Camping Management Plan will assess the integrity of other areas and will potentially provide additional protection to specific sensitive resource areas.

4.4.1.4 *Backcountry*

The Backcountry Management Zone follows the guidelines set forth by the "State Park" designation (PRC 5019.53). Approximately 21% of the Park will be designated Backcountry. Open camping, hiking, mountain biking, equestrian riding, and driving on designated roads are among the recreational activities allowed in this zone. Though not an official sub-classification, the Backcountry Management Zone remains subject to the management and resource protection constraints as delineated by the existing "State Park" classification.

4.4.1.5 *Focused-Use Zone I and Focused-Use Zone II*

Focused-Use Zone I and Focused-Use Zone II have been established to provide the potential for new facilities that blend in with regional characteristics of the land, causing the least amount of impact while providing needed amenities for visitors. Visitor use will be limited to established campsites, roads, and trails in Focused-Use Zone I and Focused-Use Zone II. Open camping is prohibited in order to concentrate visitor use and avoid causing significant impacts to sensitive cultural and natural resources. The Park is within a two-hour drive of major metropolitan areas such as San Diego and Riverside. As these cities grow and expand there will be a greater demand for recreational opportunities in ABDSP. New facilities will be provided as they are funded, planned, and developed. Future activities related to project development must be in compliance with the adopted General Plan, federal, and state regulatory requirements.

4.4.1.6 *Information/Entrance Zone*

The Information/Entrance Zone establishes brief stopping or parking areas near the Park boundaries. Park orientation is the primary focus for these areas. Information regarding safety and allowable use throughout ABDSP will be available in these zones.

Under the tiered environmental process, changes from existing conditions will undergo additional environmental review, to ensure avoidance or minimization of impacts to resources. The Preferred Alternative consolidates facilities and development within less

environmentally-sensitive areas as delineated by Focused-Use Zone I and Focused-Use Zone II designations.

4.4.2 ALTERNATIVE 1

Alternative 1 (Figure 6.7) provides the largest area of Focused-Use Zone I and Focused-Use Zone II (approximately 9,700 acres). Under this alternative, these zones accommodate an increase in visitation to campgrounds and day-use areas. These Focused-Use Zones are relatively smaller in size from the Backcountry and State Wilderness Zones but will accommodate a high concentration of people. Although visitors will be required to recreate in specifically designated campsites and on trails, damage to sensitive natural and cultural resources may occur. Alternative 1 land designations differ from the Preferred Plan in that there is more acreage in Focused-Use Zone I, Focused-Use Zone II, and Backcountry, and a smaller, but substantial, increase in State Wilderness acreage (see Table 5.7).

Alternative 1 incorporates the same types of projects as the Preferred Plan, but it classifies areas of the Park in a manner that is inconsistent with the purpose of the Park. The Declaration of Purpose, required by the Public Resources Code, §5002.2(b), states that: “ABDSP is to preserve the unique natural, cultural, and scenic resources and provide opportunities for high quality recreation consistent with the goal of protecting a healthy natural environment.” Alternative 1 does not provide adequate protection to the natural and cultural resources that make ABDSP so unique.

4.4.3 ALTERNATIVE 2

Alternative 2 (Figure 6.8) proposes about 1,300 acres of new State Wilderness and proposes 206,900 acres of Backcountry. In ABDSP, Backcountry has the potential to allow new roads and utility lines through the Park. The number of utility trucks and utility-type facilities within the Park would have the potential to increase significantly. Backcountry land-use designation in Coyote Canyon would permit new roads and utility facilities that may cause an adverse effect on bighorn sheep habitat and wilderness qualities. This is the least environmentally sensitive alternative allowing for roads and low level facility development throughout approximately 206,900 acres of ABDSP. This alternative is inconsistent with the Park purpose and does not provide the same level of protection to natural and cultural resources as the Preferred Plan.

4.4.4 ALTERNATIVE 3 – ENVIRONMENTALLY SUPERIOR

Alternative 3 (Figure 6.9) can be considered the Environmentally Superior Alternative (Table 5.7) because it provides additional protection to sacred and sensitive resources through designation of Natural or Cultural Preserves. Preserve designations are the most protective sub-unit classifications in the State Park System. This alternative reflects the largest amount of acreage in the Natural/Cultural Preserve Zone, with approximately 47,650 acres of Preserve land proposed in the following areas: Harper Flats, Hapaha Flat, sections of Coyote Canyon, Borrego Badlands, an area located between S3 and Highway 78, Carrizo Badlands,

and Carrizo Impact Area. Approximately 17,400 acres proposed as Natural/Cultural Preserves in Alternative 3 fall within the area proposed as wilderness in the Preferred Plan. However, 2,200 acres are located within the Carrizo Impact Area, which is part of the Backcountry Zone. Therefore, the number of acres designated as State Wilderness in Alternative 3 is less than in the Preferred Plan. But while Alternative 3 provides additional protection to sensitive resources, it has an adverse effect on certain existing outdoor recreation activities including highway-legal vehicle use, equestrian use, mountain bike use, and open camping. These activities would be restricted within the Natural/Cultural Preserve Zone. This alternative could cause a significant impact to recreation and is not within the general public's level of acceptable change. Furthermore, California State Parks contends that sensitive resources can be adequately protected, in compliance with existing policies and regulations, through resource-protective goals and guidelines and site-specific management and enforcement incorporated in the Preferred Plan. In addition, future management plans mandated by the Preferred Plan may result in heightened resource protection through the establishment of additional preserves. Such designations will occur based on further research and resource monitoring.

4.4.5 NO PROJECT

Public Resources Code 5003 states that before substantial work may be proposed within a state park, there must be a general plan. Therefore, the existing conditions, lack of needed facilities, and management limitations would continue if the General Plan were not adopted.

4.5 ENVIRONMENTAL EFFECTS

4.5.1 PREFERRED PLAN—ENVIRONMENTAL EFFECTS

The Preferred Alternative for the General Plan proposes to designate management zones in order to establish clear expectations associated with various types of recreation activities and development that can occur in each geographic location. "Park-Wide and Area-Specific Management Goals and Guidelines" set specific measures that must be followed (see §3) and provide further direction for managing Park resources, visitor use, and development. As a General Plan, this document does not propose specific projects and therefore, cannot identify specific projects and significant environmental effects. Identification and discussion of potential significant effects of the General Plan proposals are also general in nature. In order to aid in the evaluation of potential adverse environmental effects, a table has been created that reflects reasonable projected visitor use and development in each management zone under the proposed General Plan (see Table 5.8 "Reasonable Projection of Development"). The scenarios presented, represent one possible level of development that could occur in each management zone. Within the range of possibilities, the scenarios depicted indicate the most extensive development that should be reasonably anticipated. The actual size, type, and location of facilities will be determined in future management plans (such as Cultural Resources, Natural Resources, Backcountry Camping, Roads, Trails, Interpretive, and Facility) or in specific project plans. Future management plans will be consistent with the

goals and guidelines of the General Plan and based on many factors including natural and cultural resource protection, and visitor experience. In accordance with CEQA guidelines, these plans will undergo further environmental review when they are prepared.

As illustrated in Figure 6.6, the majority of potential facility development will occur within Focused-Use Zone I and Focused-Use Zone II. These zones represent approximately 1% of the Park's total acreage. Focused-Use Zone I and Focused-Use Zone II have the potential to accommodate an increase in visitation and demand as the population in surrounding metropolitan areas increases. Facility and trail development is not expected to increase significantly in Backcountry, Wilderness, and Preserve areas. Information/Entrance Zones add up to approximately 5 acres and will allow for parking, interpretive signage, and low level facility development at various entrance points into ABDSP.

4.5.2 UNAVOIDABLE AND IRREVERSIBLE SIGNIFICANT ENVIRONMENTAL EFFECTS

The General Plan goals and guidelines and the proposed management zone designations are intended to avoid, mitigate, and minimize significant environmental effects of facility development, maintenance, operations, and visitor use. The General Plan will be implemented by subsequent actions, each subject to further review under CEQA.

Future actions at ABDSP will be subject to the General Plan; they must be consistent with the goals and guidelines of the General Plan, and must be in compliance with local, state, and federal regulations, which includes CEQA review and compliance. If a future project does not conform to the guidelines set forth in the General Plan, it will not be implemented.

Adoption of the General Plan and designation of additionally proposed sub-unit classifications (Wilderness Areas and Cultural Preserve), *potentially significant unavoidable environmental effects*, or *significant irreversible environmental changes* are mitigated through appropriate management for each management zone and the implementation of the Plans goals and guidelines.

4.5.3 SIGNIFICANT EFFECT AND PROPOSED MITIGATION

The General Plan was developed to guide future park management decisions in the way most appropriate to fulfill the Park Vision and California State Parks *Mission*. Both the Park Vision and the Department's *Mission* place a high value on resource protection. Through application of the General Plan Goals and Guidelines, the Plan will be largely self-mitigated.

Though the majority of development will be contained to limited portions of ABDSP, the development, maintenance, and use of facilities such as buildings, roads and trails, parking lots, campsites, picnic areas, utilities, and septic systems have the potential for significant short- and long-term impacts to the environment. Negative impacts could include soil disturbance, dust, increased erosion, altered drainage patterns, lowered water quality and quantity, degradation of cultural resources, and degradation of sensitive plant communities or populations of plants or animals.

4.5.3.1 *Geological Resources (GR)*

Impact

Demolition and construction activities associated with removal, development, and maintenance of facilities, particularly in Focused-Use Zone I and Focused-Use Zone II have the potential to cause significant increases in erosion, dust, soil disturbance, and topographical change.

Discussion

Grading and soil disturbance associated with facility expansion and development, such as construction of new campsites, restrooms, buildings, and other use areas, has the potential to cause significant changes in water and erosion processes unless specific measures are taken to avoid, minimize, or mitigate environmental impacts. Facility development, campgrounds, and trails will be constructed to avoid potentially hazardous areas or minimize risk.

Geological features may be fragile and subject to significant impacts. Erosion, park operations, facility development, and recreation have the potential to increase short- and long-term impacts.

Future projects will follow General Plan guidelines for geological resources, along with mitigation measures that seem appropriate and necessary at the time a project is scoped for implementation. In addition, specific management plans containing mitigation measures will be followed.

Mitigation GR 1

General Plan goals and guidelines call for ongoing monitoring of impacts to geological resources, such as, change in topography and increased erosion. Geological features will be preserved and protected from significant impacts because of visitor use.

Mitigation GR 2

Facility development will be designed to fit the natural contours of the land in order to limit grading and additional impacts to the geographical location within ABDSP. This mitigation conforms to *Guideline – Geology 1c* in §3.3.1.2 of this document.

4.5.3.2 *Water Resources (WR)*

Impacts

Demolition and construction activities associated with removal, development, and maintenance of facilities, as well as recreational use (particularly in Focused-Use Zone I and Focused-Use Zone II), have the potential to cause significant effects to drainage patterns, runoff, or discharge into surface waters.

Discussion

Impacts associated with visitor-use areas like Tamarisk Grove and Borrego Palm Canyon have the potential to affect water patterns and water quality and quantity. Recreational use and Park operations maintenance could have short- or long-term effects to natural flow patterns, water chemistry, temperature, nutrients, and oxygen levels.

ABDSP includes the montane meadows of the western mountain border as well as the dry desert floor. Water sources and habitats associated with water resources include wet meadows, vernal pools, riparian habitat, perennial and ephemeral creeks, ground water basins, dry lakes, and washes. Roads, trails, and maintenance can cause adverse impacts to water quality and hydrological patterns. Consumptive uses of water, as well as impacts from wastewater, development, recreation, and operations have the potential to significantly affect drainage patterns, runoff, and surface water. Subsidence collapse due to water overdraft from agriculture and recreation consumptive uses has the potential to affect ABDSP, Borrego Springs, and other areas surrounding the Park boundaries (see Goals and Guidelines in §3.3.1.).

Future projects will follow General Plan guidelines, along with mitigation measures that seem appropriate and necessary at the time a project is scoped for implementation. In addition, specific management plans containing mitigation measures will be followed. All actions will be in compliance with state and federal regulatory requirements.

Mitigation WR 1

Before project development can occur within the management zones, potential impacts to water resources shall be addressed. Potential impacts to water resources, including availability of sufficient water for facility use, shall be identified and addressed. Specific management plans shall include measures to avoid, minimize, or mitigate potential impacts to water resources, and establish monitoring programs for potential long-term effects. This mitigation conforms to *Guideline – Hydrology 1a* in §3.3.1.2 of this document.

4.5.3.3 Biological Resources (BR)

Impacts

Activities (including development, maintenance, and recreational uses) involving an alteration of native vegetation or disturbance of wildlife and/or their habitat, have the potential to negatively affect endangered, threatened, or sensitive species and special status habitats.

Discussion

Many of the General Plan goals and guidelines address the protection and management of natural resources. Management of biotic resources includes maintenance of native plant communities, inventory and monitoring programs, protection of special status plants and animals, control of non-native plants and animals, protection of habitat buffers and movement corridors, and protection of natural resources from recreation and facility

development. Natural Resource goals and guidelines (see §3.3.1) recognize that activities associated with construction, maintenance, facility use, and recreation have the potential to cause short- and long-term impacts to sensitive species and the ecosystem. It is essential to periodically survey key resources and implement management directives to protect and preserve natural resources, if necessary. Measures to avoid, minimize, or mitigate impacts **shall** be incorporated into future Management Plans, development projects, and specific management actions. All actions **shall** be in compliance with federal and state regulatory requirements. Future projects **shall** follow General Plan guidelines, and include mitigation measures that **are** appropriate and necessary at the time a project is scoped for implementation.

Mitigation BR 1

Prior to construction of facilities, potentially affected areas **shall** be surveyed for the presence of special status species. Special status species found on a project site **shall** be avoided to the fullest extent possible through project design, timing of activities, and implementation. If a special status species is detected within the area of potential impact, alternative sites shall be considered, the area **shall** be flagged, and personnel educated on the sensitivity of an area and instructed to avoid it. This mitigation conforms to *Guidelines 1c, 1d, and 1f* in §3.3.1.3 of this document.

Mitigation BR 2

Project related activities within sensitive habitat of special status species will take place outside of the breeding season or season of greatest effect on their survival. If project activities cannot avoid the breeding season or the season of greatest potential effect, California State Parks will arrange for surveys of any special status species within 300 feet of the project area. If special status species are discovered within this area of potential impact, surveys will continue through the period of construction. Activities will be postponed in the event of negative impacts to special status species until the negative impacts have passed. This mitigation conforms to *Guidelines 1e and 1f* in §3.3.1.3 of this document.

Mitigation BR 3

Vehicles and roads will be required to cross perennial streams at a 90-degree angle. This will **minimize** damage to sensitive riparian habitat and reduce the level of impact. The General Plan calls for ongoing studies to monitor sensitive species and their habitats in relation to management zones.

4.5.3.4 Paleontological Resources (PR)

Impact

Demolition and construction activities associated with removal, development, and maintenance of facilities, and Park operations and recreation activities have the potential to increase short- and long-term impacts to paleontological resources.

Discussion

Fossils are the remains of past life forms that once existed in the present area of ABDSP. They provide evidence for the reconstruction of prehistoric landscapes. Geological formations in ABDSP have produced fossils dating back to ca. 450 MY. Paleontological resources within the Park are of international significance (see §2.2.2.4). Grading and soil disturbance associated with facility expansion and development, such as construction of new campsites, restrooms, buildings, and other use areas, have the potential to cause significant changes in the naturally occurring geological formations that may contain fossils. Park operations and recreation also have the potential to increase short- and long-term impacts to geological and paleontological resources.

General Plan goals and guidelines call for ongoing monitoring, protection, analysis, and recovery of paleontological resources (§3.3.1.3). Future projects and management plans will follow General Plan guidelines, as well as Public Resource Code (§5019.53 and §5097.5) and Department Resource Management Directives relevant to protection of paleontological resources. Specific mitigation measures to avoid, minimize, or mitigate impacts to these resources **shall** be incorporated as necessary at the time a project is scoped for implementation.

Mitigation PR 1

Proposed projects **shall** be reviewed by a paleontologist to determine the potential for impacts to significant resources. New facilities **shall** be designed and constructed to avoid paleontological resources to the extent possible. If impacts to paleontological resources are unavoidable, then a recovery plan **shall** be developed and implemented. If fossils are uncovered during a project, work will be controlled and redirected to allow resource recordation, recovery, and/or protection prior to additional development. This mitigation is consistent with *Guideline 1e* in §3.3.1.3 of this document.

4.5.3.5 Cultural Resources (CR)

Impacts

Activities associated with facility removal, maintenance, visitor use, or development, have the potential to disturb, degrade, or damage archaeological remains, historic features, or sacred sites.

Discussion

Significant archaeological and historical resources are known to occur within ABDSP. These include prehistoric Native American utilitarian and sacred sites, prehistoric and historic trails, and historic Civilian Conservation Corps structures. Additional historic structures within the Park include WWII sites, ranches, and homes.

Prehistoric occupation sites are susceptible to erosion because many of the artifacts and midden sites are located on or near the surface. Native American groups consider pictographs in Piedres Grandes and other areas throughout the Park, sacred areas.

Pictographs, a form of rock art, have suffered from erosion and smoke damage because of recreational activities within the Park. Steps can be taken to preserve these sacred areas and reduce potential erosion and/or damage due to visitor use.

Short- and long-term impacts associated with visitor use can be the result of exceeding the carrying capacity of a specific geographic location within the Park. Carrying capacity considers the relationship between the resource make up of the land, visitor experience, and park purpose. All impacts will be mitigated to a level below significance in order to avoid meeting and/or exceeding the carrying capacity of any area within the Park. Management directives used in order to enforce rules and educate visitors will not be exceedingly abrasive or lenient to protect both the resources and the visitor's recreational experience.

Several goals and guidelines contained in the General Plan serve to protect and preserve archaeological and historical resources by identifying, recording, protecting, and interpreting significant cultural resources (§3.3). Activities associated with demolition, construction, maintenance, visitor use, and recreation have the potential to cause significant adverse long-term impacts to cultural resources are addressed in these goals and guidelines. California State Parks must work under Public Resources Codes 5024 and 5024.5; which provide protection to cultural resources that are either listed on the National Register of Historic Places or eligible for listing. Cultural resources will also be protected through specific investigations and analysis. Given the vast size of the Park and funding cycle limitations, the priority for these planning efforts will be to identify areas with the greatest resource sensitivity and develop appropriate activities and protection for those areas. Consequently, The Public Use Interface Component of the Cultural Resource Management Plan will be the first phase of work.

Addressing cultural resource issues in public use areas will provide appropriate guidance for the delineation of camping locations and road routes. These plans will include extensive surveys of cultural resources and an evaluation of findings based on data to determine if additional management actions are necessary to protect the resources. Additional Cultural Preserves may be delineated as a result of findings. Additional plans to be completed also include the Natural Resource, Interpretive, and Facility Management Plans as well as remaining elements of the Cultural Resource Management Plan. Each plan shall be subject to CEQA review, addressing cultural resources, as it is prepared. Again, measures to avoid, minimize, and mitigate impacts shall be addressed in the aforementioned future Management Plans, development projects, and specific management actions. All actions shall be in compliance with federal and state regulatory requirements with respect to cultural resources. Future projects shall follow General Plan goals and guidelines, and include mitigation measures that are deemed appropriate and necessary at the time a project is scoped for implementation.

Mitigation CR 1

Prior to any actions that have the potential to disturb archaeological sites, additional research and testing shall be carried out to determine if buried cultural remains exist. New facilities shall be designed and constructed to avoid archaeological remains to the extent possible. If impacts to archaeological remains are unavoidable, then a recovery plan will be developed

and implemented and a Native American monitor shall be requested. To ensure that cultural resources are not adversely impacted, a California State Archaeologist will monitor those activities deemed to have the highest potential to disturb archaeological deposits. If cultural remains are uncovered during a project, work will be controlled and redirected to allow resource recordation, recovery, and/or protection prior to resuming construction. Interpretive tools will be utilized to educate ABDSP visitors on protecting cultural resources that contribute to the integrity of the Park.

Mitigation CR 2

Proposed projects will be reviewed by California State Parks Cultural Resource Specialists (Archaeologists and Historians) to determine potential impacts to significant cultural resources. Significant resources will be mapped, recorded, and evaluated to determine their eligibility for placement in the National Register of Historic Places. Projects will be designed and implemented to avoid significant impacts to potentially eligible resources in compliance with the *Secretary of the Interior Standards for the Treatment of Historic Properties*.

Mitigation CR 3

A Cultural Resources Management Plan, to be prepared subsequent to adoption of the General Plan, will identify sensitive resource areas, which may include locations within Piedras Grandes, Mountain Palm Springs, Blair Valley, Harper and Hapaha Flat, San Felipe Stage Station, and Coyote Canyon that may warrant extra protection (such as establishing preserve designations).

4.5.3.6 *Aesthetic Resources (AR)*

Impacts

Demolition and construction activities associated with removal, development, and maintenance of facilities, particularly in Focused-Use Zone I and Focused-Use Zone II, have the potential to cause significant impacts to aesthetic resources (i.e. viewsheds).

Discussion

The expansive views, natural appearance of geological and biological features, as well as quiet solitude are significant characteristics of the Park that are highly valued by the public. The General Plan recognizes this (see §2.2.4) and limits intensive development and high visitor densities to specific zones representing a small percentage of the Park's acreage. Focused-Use Zone I, proposed in areas like Borrego Palm Canyon and Split Mountain, will allow for the most intensive development that may occur within ABDSP including a visitor center, restrooms, campsites, maintenance facilities and electrical hook-ups, and has the highest potential for negative impacts to aesthetic resources. However, smaller facilities located in the other management zones also have the potential to negatively affect aesthetic resources. Future projects should be designed to be consistent with cultural, historical, and natural characteristics and themes of ABDSP. Structures should be aesthetically pleasing to

the eye, as well as blend with the environment and fit with the natural contours of the land, in order to limit grading and visual impacts.

Future projects will follow General Plan goals and guidelines, and any specific management plans containing guiding criteria or mitigation measures for limiting impacts to aesthetics (see §3.3.1.10). To avoid, minimize, or mitigate negative impacts to aesthetic resources mitigation measures that are deemed appropriate and necessary at the time a project is scoped for implementation will be incorporated.

Mitigation AR 1

Design and review of proposed projects and activities shall consider potential effects to site-specific aesthetic resources including regional characteristics and themes, viewsheds, dark skies, and topographical, geological, cultural, and natural features. Design and construction measures that avoid, minimize, or mitigate these effects shall be incorporated into every project.

4.5.3.7 Recreation Resources (RR)

Impacts

Management zone designations and sub-unit classifications associated with allowable visitor use has the potential to adversely affect some recreational activities as a result of cultural, natural, and aesthetic resource protection. Development, maintenance, erosion, dust, and resource degradation may also have an adverse affect on visitor experience.

Discussion

Management zone designations act as tools to preserve sensitive natural and cultural resources while providing recreation activities and visitor-serving facilities. Management zone designations and sub-unit classifications have the potential to restrict certain recreational activities in some areas in order to protect sensitive resources or visitor experiences, particularly in the Cultural Preserve and Wilderness Zones. For example, developed and semi-primitive campsites will be provided in Focused-Use Zone I and Focused-Use Zone II, and open camping will be allowed in the Backcountry and Wilderness Zones (which represent over 90% of the Park's acreage), but camping of any kind is prohibited in the Cultural Preserve Zone. In addition, camping will be restricted within 200 yards of water sources in all zones. Highway-legal vehicle use is confined to designated roads, but roads and motor vehicle use are prohibited within Wilderness and Cultural Preserve zones. As previously discussed, should a road be closed in the future to protect sensitive resources, the designation of additional State Wilderness would preclude options for realignment within the WZ. Such a potential realignment would require reclassification of the State Wilderness to State Park by the State Park and Recreation Commission. (See §3.2.4 for description of appropriate activities and facilities within each management zone.) Park users are concerned with maintaining current access and recreational activities in the Park. Although the Cultural Preserve designation for a specific area will eliminate camping and vehicular activity, it will permit other types of recreation activities, such as interpretive and

educational programs, and hiking on designated trails. Therefore, adverse impacts to some types of recreation activities will be offset by other recreational opportunities. The General Plan proposes to designate approximately 0.004% of the Park as a Cultural Preserve at this time. The General Plan also proposes to increase the amount of land designated as Wilderness from 65% to 74% of the Park acreage. While no existing roads or vehicle access would be affected by this action, it would eliminate the possibility for new roads and highway-legal vehicle access from an additional 9% of the Park.

Additionally, each visitor has his or her own sensitivity to visitor carrying capacity. For instance, an individual's tolerance of user or facility densities could be exceeded by low-level facility development in the Backcountry, while another individual is comforted by the presence of other people or facilities. A Visitor Study for ABDSP, conducted by the University of Montana, indicates that Park visitors will accept low to moderate levels of intrusion, i.e. land disturbance and crowding (see Appendix). Other aspects of recreation management include the degree to which multiple recreational activities compliment or conflict with one another, and with maintenance of resource integrity (see §2.2.6, 2.4.7, 3.3.1.7). The General Plan proposes that several focused management plans be prepared to deal with some of these complexities, including a Cultural Resources Management Plan, Natural Resources Management Plan, Camping Management Plan, Roads Management Plan, Trails Management Plan, Interpretive Management Plan, and Facility Management Plan (§3.4). Provisions for backcountry camping and support for backcountry travel will be addressed in the Camping Management Plan. The potential environmental impacts associated with camping will be addressed in CEQA documentation prepared in support of that subsequent plan. Park users have expressed concerns with maintaining current access and recreational activities in the Park. Under the General Plan, existing uses will be maintained except for off-trail use for equestrians in the Wilderness Zone and equestrian access in the new Cultural Preserve. Future planning efforts may further restrict some existing uses as management plans are developed, however, it is anticipated that similar recreational uses will be developed in areas with less sensitive resources.

Mitigation RR 1

General Plan goals and guidelines call for an assessment of current and potential recreational activities for compatibility with State Park, Wilderness, Cultural Preserve, and other land designations. Future management plans including, Backcountry Camping, Roads, Trails, Cultural Resource, Natural Resource, Interpretive, and Facility Management Plans, will address the relative distribution of the different types of recreational activities and potential inherent conflicts, as well as specific mitigation and monitoring measures, in order to provide high quality outdoor recreation activities while preserving the integrity of the Park.

Mitigation RR2

California State Parks will make available to the public alternative recreational activities that are compatible with resource protection in areas within ABDSP that contain sensitive natural and cultural resources.

4.5.4 *Effects Found Not To Be Significant*

The following issues are not expected to be significant as a result of the implementation of the General Plan.

4.5.4.1 *Noise*

An increase in noise is anticipated to be nominal as a result of the General Plan. Campgrounds constructed near highways or county roads could experience some traffic noise, but siting of such facilities will consider noise from nearby sources, and minimize the effects. Facility development will be constructed to avoid potential impacts to breeding birds or other animals, thus minimizing any potential long-term effects of noise on wildlife. Noise due to project development would be temporary and limited to daylight hours. Current Park regulations minimize campground noise. All future projects will be evaluated under the California Environmental Quality Act, in order to address specific potential impacts and mitigation measures.

4.5.4.2 *Air Quality*

The western portion of ABDSP is within the San Diego Air Basin, while the eastern part of the Park is in the Salton Sea Air Basin. Due to its remoteness from major urban and intensive agricultural production areas, air quality within the Park is often good and is not necessarily characteristic of the air quality in the San Diego and Salton Sea Air Basins. Occasionally, regional emissions or wildfires adversely affect that air quality. Caltrans reports that air quality in the park is also adversely affected by burning on the agricultural fields close to the park and travel on unpaved roads (Caltrans SR-78 Transportation Concept Report, p. 30). Additionally, dust is generated by uses on land adjacent to the Park. Travel on dirt roads and trails throughout the Park will generate additional dust in a non-attainment area for PM₁₀ as visitor use increases over time under the General Plan. Visitor use is anticipated to increase due to population growth in nearby urban areas and the improvement of facilities at the Park. However, use within the park is dispersed over a vast geographic area, the majority of which is wilderness. Facility development is limited to less than 1 % of the park. Approximately 5,000 acres are within the management zones that allow development but it is anticipated that development within those zones will be low-impact visitor serving park uses. The amount of pollutants, including PM₁₀, generated by park users and operations is expected to be nominal in its effect on local and regional air quality. ABDSP falls within the jurisdiction of the South Coast Quality Management District, the San Diego County Air Pollution Control District, and the Imperial County Air Pollution Control District. Each district has different rules and policies related to air quality control permits. For example, the Imperial County Air Pollution Control District exempts (in Rule 800, E9) the recreational use of public lands from air quality controls. California State Parks will comply with the required permitting and compliance requirements for projects within the appropriate air pollution control district's jurisdiction. Adoption of the General Plan or future Management Plans is not anticipated to result in a significant increase in these effects. High dust levels, due to project and facility development, will comply with appropriate

permit requirements, dust control measures, and are short-term effects found not to be significant.

4.5.4.3 *Traffic*

Although there may be an increase in population in the surrounding metropolitan areas, an increase in traffic patterns and/or congestion is not likely to occur as a result of this plan. The main corridor into the Park is State Route (SR) 78, a two-lane conventional highway, followed by three county highways (S1, S2, and S22). These highways are rural roads that operate at high levels of service except for weekend use (primarily on Sunday afternoons) during the Winter/Spring Season. According to the SR-78 Transportation Concept Report (September 1998), SR-78 is currently operating at a Level of Service *B*—free to stable flow (the minimum operating Level of Service is *E*—significant congestion and an extremely unstable flow).

The SR-78 Transportation Concept Report addresses compatibility between land use developments and statewide roads. In 1998, Caltrans projected the development of Lucky 5 Ranch to increase daily trips on SR-78 by 87,900. Portions of this property have been purchased by California State Parks and should significantly reduce this projection. Park development of Lucky 5 Ranch will have a trip-inducing effect no greater than 1000 trips per day.

4.5.4.4 *Hazardous Materials*

The Carrizo Impact Area, a former military range, could contain hazardous materials and has been closed to general public under the California Code of Regulations (CCR) Title 14 Division 3 Chapter 6 §14604. This area will be closed to the public until decontamination has been completed; a condition unchanged by the General Plan. Personnel of the United States Armed Forces may enter for the purpose of decontamination and ordinance disposal.

4.5.5 *GROWTH-INDUCING IMPACTS*

The analysis of growth inducing impact is limited to the project and its cumulative or reasonably foreseeable effects. The project is the ABDSP General Plan, a plan that limits both the amount of land available for camping or other intensive activities to small areas, and also the number of visitor-serving facilities (see Table 5.8). The Park is situated near population centers that have been are expected to continue growing rapidly; this growth is an existing and expected condition separate from the project action. The approval of the General Plan (a.k.a. the project action) will provide guidance for recreational activities, protection of resources, and allow limited new facilities. It will not provide substantial new housing, employment, or remove an obstacle to growth [per CCC Title 14, §15126.2(d)] and therefore, does not contribute to significant growth inducement.

ABDSP is primarily a wilderness Park that can be accessed by the public for day-use or camping. It would include improved visitor-use facilities in less than 1% of the Park area.

There is the potential to increase public-use areas within specific management zones in the Park. The General Plan will not substantially increase current day use or overnight visitors within the Park. Implementation of new facilities will serve the rising population, which is expected to grow by 33 % statewide and 25% locally, between 2001 and 2020. Implementation of the General Plan however, will not affect the projected population increase because the availability of additional facilities at ABDSP would be a nominal factor in the population increase. There will be no significant growth-inducing impacts, because the General Plan will not authorize a substantial increase of housing or employment opportunities, nor will it provide substantial infrastructure (such as a new road or sewer into privately held property) for significant cumulative growth. For substantial growth to occur there must be substantial market demand for new housing or industry. Although Borrego Springs is likely to continue growing steadily, it is not anticipated that approval of the General Plan will affect market demand in Borrego Springs or other adjacent areas.

4.5.6 CUMULATIVE IMPACTS

Proposals within the General Plan will not significantly contribute to the cumulative impacts of past, present, or future projects within the region. The General Plan recognizes the need for protection of sensitive natural and cultural resources within the Park, and it has taken steps to protect these areas by establishing management zones along with goals and guidelines for development and management. As addressed in §2.1.3, there are potential adverse environmental effects to aesthetic, air quality, hydrologic, natural and cultural resources that may occur within the park from the proximity or direct trespass of conflicting uses on adjacent public and private property. Within the Goals and Guidelines of the Plan (§3.3), the General Plan addresses coordination and defensive planning policies to enact appropriate defensive planning as trustees of the park's resources. Further, as ABDSP adds privately held lands (Sections 2.1.4 & 3.3.1.10) and opens them to public use, there is the potential for adverse cumulative environmental impacts due to new recreational access on adjacent land owned by others. For example, natural and cultural resources could be potentially impacted by new recreational users should the adjacent landowner (BLM, USFS, or private) not have a program or policy in place to protect such resources. Additionally, there could be unauthorized trespass from public lands onto private lands. California State Parks will coordinate with adjacent landowners, particularly with new acquisitions, to address these issues as well as defensive planning issues. Closures by other public recreation providers in the region may limit recreational activities and the place greater demand on similar recreational areas within the Park and region. Depending on the sensitivity of the resources present in such areas, there may be adverse effects on natural, cultural, and other physical resources as well as the experience of the recreational user that appreciates the solitude or adventure found in such areas.

Some types of recreation will be reduced in the expanded Wilderness and Cultural Preserve Zones in an effort to protect valuable resources. While this will negatively affect certain types of recreational activities, it will have a less-than-significant effect on recreation overall. Future projects must conform to the General Plan and will require project-level environmental compliance.

4.5.7 BENEFICIAL ENVIRONMENTAL EFFECTS

Many of the proposed management practices will protect or enhance Park resources, such as plants, wildlife, viewsheds, and cultural resources, above and beyond what is required for the mitigation of impacts resulting from the current uses of the Park. Management guidelines contained in future Backcountry Camping, Roads, Trails, Cultural Resource, Natural Resource, Interpretive, and Facility Management Plans will likely result in additional beneficial environmental effects.

4.5.8 MITIGATION AND MONITORING

The General Plan contains policy goals and guidelines that are intended to guide and mitigate potential environmental effects of future plan implementation. Specific mitigation measures will be identified during the preparation of each subsequent project and CEQA document proposed under the General Plan. Such mitigation measures would also be subject to approval by regulatory agencies with jurisdiction over the resources affected. At a minimum, the mitigation measures stated in §4.3.3 will be incorporated into project development in order to avoid impacts resulting from facility construction, maintenance, and visitor use. Subsequent projects will need to be found consistent with this General Plan, as adopted, and with its mitigation policies. A Mitigation Monitoring Program would be prepared for any subsequent project where mitigation was required to avoid a potentially significant impact. The General Plan itself does not require a mitigation, monitoring and reporting plan.

4.6 PUBLIC COORDINATION

Section 2.3.5 contains a discussion of the public involvement utilized during the planning process. The following addresses the public involvement pertinent directly to the CEQA compliance process. This document is a recirculation of the Preliminary General Plan/EIR for ABDSP. The following addresses a summary of the public comments for the circulation of the January 2003 ABDSP Preliminary General Plan/EIR. This recirculation was from July 16, 2004 to September 13, 2004. The full text of the comment letters and California State Parks responses for to the July 2004 Preliminary General Plan/EIR recirculation are available on the website for California State Parks and referenced by the ABDSP General Plan (http://www.parks.ca.gov/default.asp?page_id=21314) or by request at the Southern Service Center. The summary of the July 16, 2004 public comments is listed at the end of this section in Table 4.1.

A Notice of Preparation (NOP) was circulated through the State Clearinghouse, to local city and county planning offices, as well as to affected special interest organizations and individuals. The State Clearinghouse reference number is SCH # 2002021060. The CDFG responded to the NOP. The NOP and NOP responses are contained in a separate appendix distributed to the public with the draft EIR (see Appendix). The January 2003 Preliminary General Plan and Draft Environmental Impact Report were initially made available for public review and comment between January 17, 2003 and March 3, 2003. Comment letters and responses from California State Parks, as well as changes proposed for the November 2003

Preliminary General Plan/FEIR, were prepared in a separately bound document. With the release of both the January 2003 and July 2004 Preliminary General Plan / Draft Environmental Impact Reports, there was a press release in the San Diego Union-Tribune and Borrego Sun. This data was also available on the Office of Planning and Research State Clearinghouse website and the Anza-Borrego General Plan web page of the California State Parks website. State Parks received numerous phone calls requesting extensions of both of the 45-day comment periods. The comment period was officially extended by two weeks for the July 2004 Preliminary General Plan/EIR.

4.6.1 JANUARY 2003 PUBLIC REVIEW SUMMARY

The following agencies, organizations, or persons submitted written comments on the January 2003 Preliminary General Plan/Draft Environmental Impact Report. Eighteen letters were received within the comment period and sixteen were received after the comment period closed. Two of the letters expressed support for the Preliminary General Plan/Draft Environmental Impact Report, one of which had specific concerns or suggestions for revisions within the proposed plan. One letter supported either the Preferred Plan or Alternative 3 (Environmentally Superior Alternative) and five letters fully supported Alternative 3. Eleven of the letters did not state a position either in favor of or against the Preliminary General Plan/Draft Environmental Impact Report; however, ten of these letters addressed specific concerns. Seven of the letters opposed major elements of the plan or felt that no plan should be done at all. Eight of the letters proposed that California State Parks adopt Alternative 2 versus the Preferred Plan.

Support Preferred Plan: San Diego Off-Road Coalition and Desert Protective Council. Please note that San Diego Off Road Coalition requested that their support be changed to a qualified support of Alternative 2.

Support Preferred Plan or Alternative 3: San Diego Audubon Society.

Support Alternative 3 (Environmentally Superior): Center for Biological Diversity, Save Our Heritage Organization, San Diego County Archaeological Society, Inc., Courtney Ann Coyle (Attorney at Law), and Society for California Archaeology.

No Position: Cleveland National Forest, Senator Bill Morrow, California Regional Water Quality Control Board, San Diego Unit Backcountry Horseman of California, Disabled Equestrian Organization, California Equestrian Trails and Lands Coalition (first letter), San Diego Outback Tours, Community Land Development, Canebrake Improvement Association, Howard and Harriet Allen, and Native American Heritage Commission. Please note that Senator Bill Morrow requested that his letter be changed to Opposed.

Do Not Support Preferred Plan: Lounsbery, Ferguson, Altona & Peak LLP, Citizens Against Recreational Eviction, Nola Michel (Two Letters), Les Levie, Equestrian Trails, Inc., and Cliff McDonald.

Support Alternative 2: Off Road Business Association, T. Todd, Wayne M. Todd, Wayne A. Todd, California Equestrian Trails & Land Coalition (second letter), Backcountry

Horseman of California Antelope Valley Unit, California Off Road Vehicle Association, Inc., and Barbara Ferguson (Vice President, Public Lands). Please note that Barbara Ferguson requested that the BCH position be listed as qualified support for Alt. 2.

4.6.2 JULY 2004 PUBLIC REVIEW SUMMARY

The GP/EIR was recirculated for public review on July 16, 2004 and 59 comment letters were received. The comment period was extended to September 13, 2004 and two comment letters were received late, but are included. The following matrix summarizes the comment letters and states the name of the agency, organization, or person sending the letter. Each of the comment letters is available for public review in a separately bound document. Twenty-five of the letters supported the approval of the Preliminary General Plan/EIR, twelve opposed approval, and fifteen did not clearly state a position. Seven letters expressed support for an Alternative other than the Preferred Plan. Eight letters expressed support for both the Preferred Plan and Alternative 3 and were counted in the twenty-five letters of support.

Below is a summary of the 59 comment letters received on the July 2004 ABDSP Preliminary GP/DEIR. This summary excludes many varied substantive comments in the interest of brevity. Each of these substantive comments is addressed with California State Parks responses to each letter in the Comment Letters & Responses, a separately bound document. If a position or organization membership was not clearly stated in the letter, it was not included in the summary. Most of the letters clearly stated a position, however, if not clearly stated but the intent was clear, the direction of the comments has been addressed.

TABLE 4.1

CODE	Commentor/Membership	Position on GP	Specific Additional Comments	Alternatives
CL 1	<u>U.S. Forest Service -</u>	<u>No position</u>	<u>No comments/USFS Plan Ongoing</u>	
CL 2 CL2A	<u>Bill Morrow</u> <u>California State Senator,</u> <u>38th District</u>	<u>Opposed</u>	<u>Requests 30 day extension/Fully supports combined CARE letter (CL 15) /cmmt regarding previous position</u>	<u>None stated</u>
CL 3	<u>Native American Heritage Commission</u>	<u>Generally Approved</u>	<u>Comments on improving Native American coordination, etc.</u>	<u>None stated</u>
CL 4	<u>County of San Diego</u>	<u>No position</u>	<u>Several comments requesting minor changes</u>	
CL 5	<u>San Diego Gas & Electric</u>	<u>Not clearly stated</u>	<u>Substantial comments including opposition to Wilderness & Backcountry Zones</u>	<u>Opposed to all Alternatives</u>

CL 6	<u>Lounsbery, Ferguson, Altona & Peak, LLP - Hubbard</u>	<u>Opposed</u>	<u>Extensive comments (10 pages)</u>	<u>None stated</u>
CL 7	<u>(NRDC) Natural Resources Defense Council - 550,000 members/125,000 CA members</u>	<u>Supports</u>	<u>Additional comments including a request to proceed with management plans</u>	<u>Supports PA & 3/ Opposes 1 & 2</u>
CL 8	<u>Defenders of Wildlife</u> 475,000 members/ 100,000 CA members	<u>Supports</u>	<u>Additional comments incl. request to proceed with mgmt plans</u>	<u>Support PA&3 Opposes 1 & 2</u>
CL 9	<u>California Wilderness Coalition</u> 5,000 members w/ 200 mem. Org./spons	<u>Supports</u>	<u>Additional comments including a request to proceed with mgmt plns</u>	<u>Supports PA & 3</u>
CL10	<u>Sierra Club</u>, San Diego Chapter, Desert Committee	<u>Supports</u>		
CL11	<u>California Native Plant Society</u>	<u>Supports</u>	<u>Additional comments including a request to proceed with management plans</u>	
CL12	<u>San Diego Audubon Society</u> 3,000 members	<u>Supports</u>	<u>Supporting comments w/ recommendations</u>	<u>Supports PA</u>
CL13	<u>San Diego County Archaeological Society</u>	<u>Not clearly stated</u>	<u>Against lack of cultural preserves – additional comments</u>	
CL14	<u>Save Our Heritage Organization</u>	<u>Not clearly stated</u>	<u>Against lack of cultural preserves – additional comments</u>	
CL15	<u>Combined CARE letter*– signatures representing 19 organizations and 2 individuals</u>	<u>Opposed</u>	<u>Extensive opposing comments regarding access/management</u>	
CL16	<u>United 4 Wheel Drive Assoc. & CA Assoc. of 4 Wheel Drive Clubs</u> 20,000 members	<u>Opposed</u>	<u>Extensive opposing comments regarding access/management – similar to CL 15</u>	
CL17	<u>CORVA –</u>	<u>Opposed</u>	<u>Extensive opposing comments regarding access/management</u>	
CL18	<u>Backcountry Horsemen of California</u> 4000 members -		<u>Extensive opposing comments regarding access/ management/ trail closures</u>	<u>Qualified support of Alternative 2</u>
CL19	<u>BCH – Antelope Valley Unit/Antelope Valley</u>	<u>No Position</u>	<u>Extensive opposing comments against</u>	

	<u>Trails Recreation and Environmental Council</u> 5000 members –		existing and future trail closures to equestrians	
<u>CL20</u>	<u>San Diego Off Road Coalition</u>		Comment regarding clarification of previous position	Qualified support of Alt. 2
<u>CL21</u>	<u>The Desert Protective Council</u>	Supports	Qualifying comments	
<u>CL22</u>	<u>California (PEER) Public Employees for Environmental Responsibility</u> 1200 members	Supports	Additional supporting comments including a request to proceed with management plans	Opposes 1 & 2
<u>CL23</u>	<u>Desert Survivors</u> – 800 members	Supports	Additional comments including a request to proceed with management plans	Supports PA/ Opposes 1 & 2
<u>CL24</u>	<u>Adventure Airsports, LLC</u> -	No position	Supporting - Request to keep hang gliding	
<u>CL25</u>	<u>(SANDAC) San Diego Alliance of Climbers</u> –	No position	Request support/access for climbing enthusiasts	
<u>CL26</u>	<u>Larry Hogue</u> – local outdoor author	Supports	Supporting comments	Supports PA
<u>CL27</u>	<u>Diana Lindsay</u> – Sunbelt Publications	Supports	Supporting comments	Supports PA
<u>CL28</u>	<u>Pat Flanagan</u>	Supports	Property owner w/supporting comments	Supports PA&3
<u>CL29</u>	<u>Brian Seifker</u>	Opposed – (not stated)	Property Owner adjacent to proposed Wilderness Zone – see comments	Supports No Project
<u>CL30</u>	<u>Eric Korevaar</u>	No stated position	Property Owner - see comments	
<u>CL31</u>	<u>Louis Busch</u>	No stated position	Property Owner - see comments	
<u>CL32</u>	<u>Chip Gaylor & Judy Ramirez</u>	General Support	Property Owner - see comments	Generally support PA
<u>CL33</u>	<u>Marsha Boring</u>	Support	Anza resident	Support PA
<u>CL34</u>	<u>Doug & Sandy Lawrence</u>		Comments against opening areas to ATV	Support Alt. 3
<u>CL35</u>	<u>Kathleen Hayden</u>	Opposed	Extensive opposing comments re: access	
<u>CL36</u>	<u>Michael Arbogast</u>	Opposed	Similar to CARE letter	
<u>CL37</u>	<u>Jim Arbogast</u>	Opposed	Extensive opposing comments regarding	

			GP/Access/management	
CL38	<u>Stan Haye</u>	<u>Supports</u>	<u>Supporting comments</u>	<u>Support PA &3 /Opposed 1 &2</u>
CL39	<u>Shawn Kelley</u>	<u>No stated position</u>	<u>Opposing comments w/ positive aspect— member of Jeep Club, extensive user</u>	
CL40	<u>Stuart & Bonnie Resor</u>	<u>No Position</u>	<u>Suggestion comments</u>	
CL41	<u>Kim Floyd</u>	<u>Supports</u>		<u>Support PA&3</u>
CL42	<u>Thomas Todd</u>			<u>Support Alt 2</u>
CL43	<u>Wayne A. Todd</u>			<u>Support Alt 2</u>
CL44	<u>Kiyome Fox</u>	<u>No stated Position</u>	<u>Supporting Comments – took 3 buses to attend meetings</u>	
CL45	<u>Estelle Delgado</u>	<u>Supports</u>		<u>Support PA & 3/ Opposed 1 & 2</u>
CL46	<u>Kelly Fuller</u>	<u>Supports</u>	<u>Additional comments including a request to proceed with management plans</u>	<u>Supports PA/ Opposes 1 & 2</u>
CL47	<u>Howard Gross</u>	<u>Supports</u>	<u>Additional comments including a request to proceed with management plans</u>	<u>Supports PA & 3/ Opposes 1 & 2</u>
CL48	<u>Callie Mack</u>	<u>Supports</u>	<u>Additional comments inc. request to proceed with mgmt plans</u>	<u>Support PA</u>
CL49	<u>Carol A. Wiley</u>	<u>Supports</u>	<u>Additional comments including a request to proceed with management plans</u>	<u>Supports PA & 3</u>
CL50	<u>Jeffery Thieret</u>			<u>Supports Alt 3/ Opposes 1 & 2</u>
CL51	<u>Frank Hamann</u>	<u>No Position</u>	<u>Requests provision for Hang Gliding</u>	
CL52	<u>Phillip Roullard</u>	<u>Supports</u>		<u>Supports PA</u>
CL53	<u>Barbara Tidball</u>	<u>Supports</u>	<u>Additional comments including a request to proceed with management plans</u>	<u>Supports PA</u>
CL54	<u>Tom Donnelly</u>	<u>No stated position</u>	<u>Comments re: rock climbing</u>	

CL55	<u>Thomas Arbanas</u>		<u>Comments regarding preservation</u>	<u>Supports Alt 3</u>
CL56	<u>Larry & Pat Klaasen</u>	<u>Supports</u>	<u>Additional comments</u>	<u>Support PA</u>
CL57	<u>Courtney Coyle</u>	<u>No position</u>	<u>Requested additional time/</u>	
CL58	<u>Courtney Coyle/Carmen Lucas</u>	<u>Supports need for Plan - but not as proposed</u>	<u>Responded w/ late comments 9/20/04 / Wants additional cultural preserves beyond those proposed in Alt 3</u>	
CL 59	<u>6 California Legislators – Dennis Hollingsworth Senator, 36th, Jim Battin Senator, 37th, John J Benoit, Assembly 64th, Bonnie Garcia, Assembly, 80th, Ray Haynes, Assembly, 66th, Jay La Suer, Assembly, 77th</u>	<u>Opposed</u>	<u>Responded w/ late comments 9/23/04, similar to portions of CL 6.</u>	

***Signatories & supporters of the combined CARE letter (CL15) are as follows:**

CARE – Citizens Against Recreational Eviction – USA; California State Senator Bill Morrow; CORVA – California Off Road Vehicle Association, San Diego Off-Road Coalition; Americans for Forest Access, Mountain Coalition; The Warrior’s Society, Public Lands for the People, Inc.; High Desert Multiple Use Coalition, Wm. R. Seymour; Coachella Valley Trails Council; FOTR – Friends of the Rubicon; AMA District 37- Dual Sport; Jeeping Jeepers Jeep Club, Inc.; Out Four Fun 4 Wheel Drive Club; South District Individual Member Representative (700 members), Natural Resource Consultant, California Association of 4 Wheel Drive Clubs (see CL16 for membership), Friends of Oceano Dunes, Michael Arbogast, Blue Ribbon Coalition, OC Dualie & D-37 Rider Representative, BCHC – Back Country Horseman of CA-Borrego Springs & Caballeros del Sol Units